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December 7, 2021

VIA ECF

Hon. Vernon S. Broderick, U.S.D.J.
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Flores et al v. Chowbus Inc. et al
1:21-cv-00970-VSB

Your Honor:

We represent Plaintiffs in the above referenced matter. We write to respectfully ask the court an extension for completing discovery. The current deadline is December 14th, 2021. This is the second request of its kind.

The reason for this request is because during the parties' November 1 meet and confer Plaintiffs agreed to revise and supplement discovery responses and therefore need sufficient time to produce said responses. Additionally, Defendants have agreed to withdraw their timeliness objection to Plaintiffs' discovery requests and are in the process of responding to Plaintiffs' interrogatories and document requests. Furthermore, the parties are discussing possible deposition dates. Accordingly, the parties respectfully request the Court extend discovery for 60 days.

We thank the Court for its attention to this matter.

Respectfully Submitted,

/s/ Clela Errington
Clela Errington, Esq.
CSM LEGAL, P.C.
Attorneys for Plaintiff

Cc: Defendants' Counsel (via email and ECF)